

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

SAN FRANCISCO DIVISION

IN RE: UBER TECHNOLOGIES, INC.,
PASSENGER SEXUAL ASSAULT
LITIGATION

Case No. 3:23-md-03084-CRB (LJC)

**JOINT STIPULATION IN RESPONSE TO
COURT ORDER ECF 3786**

This Document Relates to:

Judge: Hon. Lisa J. Cisneros
Courtroom: G – 15th Floor

Jaylynn Dean v. Uber Technologies, Inc., et al.,
No. 3:23-cv-06708

1 The Parties respectfully submit this joint stipulation in response to the Court's Order. *See* ECF
 2 3786. The Parties met and conferred in compliance with the Court's Order pertaining to the *Dean* case as
 3 set out in ECF 3786 and reached the following agreements:
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- 5 1. The Parties agree that by September 12, 2025, Plaintiff and non-party witnesses B.F., E.G.,
 6 J.D., and D.S. (each of whom are represented by counsel for Plaintiff) will each submit verified
 7 declarations complying with ECF 3786, which will include a description of (1) what steps were
 8 conducted to search for any requested information; (2) what steps were conducted to preserve
 9 any requested information; (3) what steps were conducted to replace, wherever feasible,
 10 allegedly lost documents obtainable through third-party sources; (4) what they knew about
 11 whether their messages were preserved on particular devices, backup systems, and messaging
 12 and social media platforms; and (5) when they were informed of their duty to preserve
 13 requested information.
- 14 2. The Parties agree that by September 16, 2025, Defendants will notify Plaintiff as to its position
 15 on whether the depositions of the Plaintiff, B.F., E.G., J.D., and/or D.S. should be reopened.
- 16 3. The Parties agree that if the Defendants request to reopen any of the depositions after reviewing
 17 the declarations, the parties will meet and confer on this issue by September 19, 2025.

21 Respectfully submitted,

22 DATED: September 5, 2025

23 By: /s/

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 25 RACHEL B. ABRAMS (SBN 209316)
26 PEIFFER WOLF CARR KANE
27 CONWAY & WISE, LLP
 555 Montgomery Street, Suite 820
 San Francisco, CA 94111
 Telephone: (415) 426-5641
 Email: rabrams@peifferwolf.com

28 LAURA VARTAIN
KIRKLAND & ELLIS LLP
 LAURA VARTAIN
Laura.vartain@kirkland.com
 ALLISON M. BROWN (*pro hac vice*)
Alli.brown@kirkland.com
 JESSICA DAVIDSON (*pro hac vice*)
Jessica.davidson@kirkland.com

1 ROOPAL P. LUHANA (*Pro Hac Vice*)
2 **CHAFFIN LUHANA LLP**
3 600 Third Avenue, Fl. 12
4 New York, NY 10016
5 Telephone: (888) 480-1123
6 Email: luhana@chaffinluhana.com

*Counsel for Defendants Uber Technologies,
Inc., Rasier, LLC, and Rasier-CA, LLC*

7 SARAH R. LONDON (SBN 267083)
8 **GIRARD SHARP LLP**
9 601 California St., Suite 1400
10 San Francisco, CA 94108
11 Telephone: (415) 981-4800
12 Email: slondon@girardsharp.com

13 *Co-Lead Counsel for Plaintiffs*

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